

Department of Toxic Substances Control, Paul E. Ruffin, P.E.,  
Supervising Hazardous Substances Engineer I  
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Terry Tarran  
Agency Secretary  
CalEPA

Department of Toxic Substances Control

Edwin F. Lowry, Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200



Arnold Schwarzenegger  
Governor

May 26, 2004

Mr. Thomas R. Grim  
Document Manager  
U.S. Department of Energy  
National Nuclear Security Administration  
Livermore Site Office, L-293  
7000 East Avenue  
Livermore, California 94550-9234

COMMENTS ON THE LAWRENCE LIVERMORE NATIONAL LABORATORY (LLNL)  
SITE-WIDE AND SUPPLEMENTAL PROGRAMMATIC ENVIRONMENTAL IMPACT  
STATEMENT (SW/SPEIS)

Dear Mr. Grim:

The Department of Toxic Substances Control (DTSC) appreciates the opportunity to comment on the above-captioned document. DTSC recognizes the effort expended by the Department of Energy (DOE) in preparing Appendix B of the SW/SPEIS, which consolidates discussion of waste operations and addresses potential impact areas identified in the California Environmental Quality Act (CEQA) Initial Study format. This format was suggested in DTSC's letter to the DOE on December 2, 2002. The Standardized Permitting and Corrective Action Branch circulated the LLNL SW/SPEIS and Appendix B for comment to the Site Mitigation and Brownfields Reuse Program and the Environmental Analysis and Regulations Unit. DTSC's consolidated comments are presented below for your consideration.

General Comments

DTSC may perform an environmental analysis when complying with CEQA for discretionary decisions on proposed projects, which could include permit renewals, permit modifications, corrective action, or closure plans. As indicated in the SW/SPEIS, LLNL may propose these types of projects to DTSC in the future. DTSC intends to use the LLNL SW/SPEIS and Appendix B as a resource in developing environmental setting information when conducting CEQA evaluations for proposed projects at LLNL. In addition, DTSC may also consider the risk of upset analysis scenarios for the hazardous waste management facility processes in its CEQA analyses.

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1/22.03

DTSC recently updated the Initial Study format and eliminated the Special Initial Study. Therefore, remove all text references in the SW/SPEIS to the word "special." There is now only the Initial Study.

Specific Comments

2/25.02

Chapter 5, Section 5.5.2, Chemical Accident Scenarios, and Section D.3, Accident Scenarios Involving Toxic Chemicals: It is not clear whether the actions in Table B.3-3, Summary of Permit Actions and Other Waste Management Actions by Alternative, were considered during the selection process for accident scenarios. In particular, was the storage of hazardous and mixed waste in Building 696R considered in the evaluation of chemical accident scenarios? Table 5.5.2.2-1, Potential Chemical Accident Consequences, and Table D.3.2-1, Potential Chemical Accidents, do not include Building 696R.

3/22.07

Appendix B, Section B.1.3, Waste Management Facilities at the Livermore Site: Building 419 has undergone a series of partial closure activities, but additional closure work may be required. DTSC received a "Final Closure Plan for Building 419," dated February 28, 2001, which is pending review and approval. The Building 419 closure should be discussed in the SW/SPEIS in a manner similar to the descriptions for Building 233. Although the Closure Plan proposes a risk-based clean closure, it leaves an option for the possibility of post-closure care, if clean closure cannot be achieved. This option should be considered in your discussion.

4/25.02

Appendix D, Section D.3.2.10, Buildings 514/612/625/693, Radioactive and Hazardous Waste Management Complex - Earthquake Release of Freon-22: The accident scenario includes an assumption that process reagents stored in 55-gallon drums are not stacked too high. The Hazardous Waste Facility Permit for the LLNL Main Site would allow stacking of 55-gallon drums. Permit condition IV.9.(d) restricts stacking of containers, other than 4'x4'x7' boxes, to a maximum height of eight (8) feet.

If you have any further questions regarding this review, please contact me at (916) 255-6677 or Ms. Nicole Sotak, Office of Environmental Analysis, Regulations and Audits, at (916) 327-4508.

Sincerely,

Paul E. Ruffin, P.E.  
Supervising Hazardous Substances Engineer I  
Standardized Permitting and Corrective Action Branch

cc: See next page

Department of Toxic Substances Control, Paul E. Ruffin, P.E.,  
Supervising Hazardous Substances Engineer I  
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Mr. Thomas R. Grim  
May 26, 2004  
Page 3

cc: Ms. Nicole Sotak  
Office of Environmental Analysis, Regulations and Audits  
Department of Toxic Substances Control  
1001 "I" Street, 22<sup>nd</sup> Floor  
P.O. Box 806  
Sacramento, California 95812-0806

Mr. Ted Park  
Site Mitigation and Brownfields Reuse Program  
Department of Toxic Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, California 94710

DeVinney, Jean  
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5980 Westover Drive  
Oakland, CA., 94611  
April 17, 2004

Tom Grim  
DOE, NNSA, L-293  
7000 East Avenue  
Livermore, CA., 94550

Dear Mr. Grim:

1/04.01

I have been following the nuclear activities at Livermore Lab for the past 10 years. I am particularly concerned and appalled with the new plans of storing double the plutonium, producing plutonium pits, "enhancing" readiness to conduct underground nuclear tests, and allowing manufacture of tritium targets for the NIF.

2/02.01

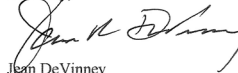
The development and testing of new nuclear weapons is a travesty to all mankind and should be stopped. The obsession with the need for a nuclear arsenal of the size we currently have and then increasing that with newer more useable weapons should be stopped at all costs. There simply has to be a better way to insure our safety from terrorism or war.

3/23.01

The Livermore Lab sits in a large and growing community that should not have to be subjected to the possibility of a leak, underground pollution or having biological weapons stored near to them.

The possible cost to lives, environment and the statement it makes about the U.S. proliferation to the rest of the world is not worth whatever the perceived benefits from these plans.

Sincerely,

  
Jean DeVinney

Dionisi, Dave  
Page 1 of 1

-----Original Message-----

From: Dionisi@aol.com [mailto:Dionisi@aol.com]  
Sent: Thursday, May 13, 2004 8:21 AM  
To: tom.grim@oak.doe.gov  
Subject: Disapproval of Proposed 10 Year Plans

May 13, 2004

Mr. Tom Grim  
US DoE, National Nuclear Security Administration  
L-293, 7000 East Avenue  
Livermore, California 94550

Dear Mr. Grim:

I am a private citizen that believes the plans to expand the Lawrence Livermore facility are harmful to the our national security as well as our environment.

Please do not:

- \* Double the amount of plutonium available for research, from 1,540 pounds to 3,300 pounds;
- \* Revive the plutonium atomic vapor laser isotope separation project;
- \* Produce new plutonium pits for nuclear weapons;
- \* Increase the amounts of plutonium, uranium and lithium hydride available for experiments in the National Ignition Facility;
- \* Manufacture tritium for use in thermonuclear experiments at the National Ignition Facility;
- \* Enhance the readiness for full-scale underground nuclear testing; and
- \* Construct a Bio-Safety Level 3 facility at Livermore to experiment with bio-toxins and biological agents including anthrax, bubonic plague, botulism, and even genetically modified lethal bio-warfare agents.

Sincerely, Dave

David Dionisi  
80 Keystone Way  
San Francisco, CA 94127

1/04.01

Donahue, Peggy and Mike  
Page 1 of 1

-----Original Message-----

From: Peggy & Mike Donahue [mailto:summits@earthnet.net]  
Sent: Saturday, May 01, 2004 10:39 AM  
To: tom.grim@oak.doe.gov  
Subject: Livermore

Dear Sir,

This note is being written to express extreme opposition to the proposed expansion at Livermore National Laboratory east of San Francisco. The plan purportedly triples the amount of plutonium that scientists can work with at any one time while also greatly increasing the potential for an accidental chain reaction. Additionally, the plan will add plutonium, highly-enriched uranium and lithium hydride to experiments at the NIF (National Ignition Facility), to increase its usefulness for nuclear weapons development. It allows the manufacture of tritium targets for the NIF megalaser. The tritium-filled targets are the radioactive fuel pellets that the NIF's 192 laser beams will "shoot" in an attempt to create controlled thermonuclear explosion. According to Marylia Kelley, of Tri-Valley CAREs (www.trivalleycares.org), producing the targets will increase the amount of tritium that is used in any one room at Livermore Lab from the current limit of just over 3 grams to 30 grams. The lab has a history of tritium accidents, spills and releases. Does this pattern sound familiar?

*All of this poses inestimable risk to the workers, the citizens around the lab, the people of the world and the entire plant. It weakens the treaties put in place through tireless work and hard fought negotiations by world citizens who understand full well that nuclear weapons and their threatened use make war not only utterly insane but obsolete in a very practical sense.*

Thank you for your time and thanks in advance for wisely and immediately stopping this DOE plan.

Sincerely,  
Peggy & Mike Donahue  
Concerned Citizens

1/04.01

Drebmeier, Peter  
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	4/21/04
	Dear Mr. Grim,
1/02.01	I am very opposed to any expansion in nuclear weapons research and development at Lawrence Livermore Lab. This deadly work should cease at once!
2/33.01	Living in the Bay Area, I am very concerned about the proposal to double the amount of plutonium so close to home. The thought of the lab producing up to 450 bomb cores annually is frightening.
3/37.01	I worked hard in the early 1990s to stop nuclear testing, and will continue to protest any proposals to resume nuclear testing.
4/39.01	Please do everything in your power to stop the EIR for Lawrence Livermore's next 10 years of operation. It is time to protect our national security through environmental cleanup, not more weapons of mass destruction.
5/07.01	
	Sincerely, Peter Drebmeier 3153 Stelling Dr. Palo Alto, CA 94303

Duane, Judy  
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	<p>-----Original Message-----  From: judyduane@fastmail.fm [mailto:judyduane@fastmail.fm]  Sent: Monday, April 26, 2004 4:01 PM  To: tom.grim@oak.doe.gov  Subject: Public Comment on the Environmental Impact of Lawrence Livermore Lab</p> <p>To: Mr. Tom Grim  Department of Defense</p> <p>Dear Mr. Grim:</p> <p>As a member of the public, I wish to provide my input regarding the environmental impact of Lawrence Livermore Lab in the past, present and future, as follows:</p> <ol style="list-style-type: none"> <li>1. In the past, this facility has been a danger to the health and the life, not only of human beings in the area, but to those in the entire world, because of its purpose--which is to create the ability to kill and harm life itself in a catastrophic manner. The types of harmful products being developed and tested there are anathema to life and to the earth, in themselves, and should be banned.</li> <li>2. In the present, the situation described above is still in effect, and should be banned.</li> <li>3. In the future, which this environmental impact statement for Lawrence Livermore Lab addresses, I understand that the DOE and Livermore Lab plan to <ol style="list-style-type: none"> <li>a. More than double the plutonium limit at the lab from 1,540 to 3,300 pounds.</li> <li>b. Manufacture prototype plutonium bomb cores (pits) on site.</li> <li>c. Heat plutonium and shoot multiple laser beams through the vapor cloud, in an attempt to create a nuclear explosion.</li> <li>d. Manufacture tritium targets (radioactive fuel pellets).</li> <li>e. Undertake a speedy return to full-scale nuclear testing.</li> <li>f. Import live anthrax, plague and other pathogens, co-locating a bio-warfare agent research facility with nuclear weapons.</li> </ol> </li> </ol> <p>There is already an increase in cancer rates around the Lab.</p> <p>The Lab sits on two earthquake faults.</p> <p>Microscopic amounts of some or all of the ingredients to be manipulated and stored there can cause lung cancer and carry additional risks.</p> <p>The amount of airborne radioactivity emanating from the Lab will be increased, while the Lab already has a history of tritium accidents, spills and releases.</p>
1/04.01	

**Duane, Judy**  
**Page 2 of 2**

2/39.01 | The Lab would be taking a dangerous step back to the days of unrestrained nuclear testing by pursuing the development of diagnostics to enhance the nation's readiness to conduct nuclear testing.

1/04.01 | I vehemently oppose any and all of the above proposed changes, and I ask that the work that is presently being done there that I have addressed in this letter be stopped, as well.  
cont.

Thank you for your morally conscious attention to my input.

Sincerely,

Judy Duane

--

judyduane@fastmail.fm

**Duane, Judy**  
**Page 1 of 1**

To: Mr. Tom Grim  
Dept. of Energy

Dear Mr. Grim:

I am vehemently opposed to the proposed changes and additions to the program at Lawrence Livermore Lab, as well as the the existence of the present program.

1/04.01 | Any one of these facts--that the Lab sits on two earthquake faults, that it has a history of tritium accidents, spills and releases, and that there is already an increase in cancer rates around the Lab, should be enough to terminate the present program, let alone allow the consideration of an increase in its operations.

2/06.01 | I urge you to cancel any further plans to add to the program, and I urge you to terminate the present program.

Please listen to your conscience in considering the best and the right decision on this extremely important matter. The environment of the Lab is depending on you, and the world awaits your ethical judgment.

Thank you so much for your very conscious attention to what I have said.

Sincerely,

Judy Duane

--

judyduane@fastmail.fm

Duncan, Susan  
Page 1 of 1

1/04.01



I, Susan Duncan not bod,  
am totally against any  
increase in the nuclear  
weapons activities at  
Livermore Lab.

This seems like a bad  
penny that just keeps on  
coming back - tho it is  
much more than a penny.

4-7-04

Sincerely yours.

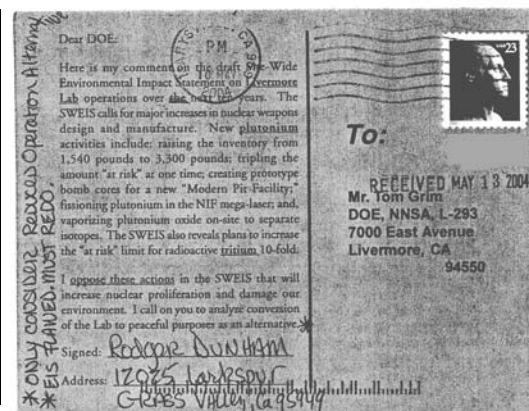
Susan Duncan



Susan Duncan  
1475 Mountain Blvd  
Oakland CA 94611-2009

Dunham, Rodger  
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1/06.01  
2/31.04  
3/01.01  
4/04.01  
5/07.01



**Dust, Ernest and Arline****Page 1 of 1**

-----Original Message-----

From: eadust at earthlink.net [mailto:eadust@earthlink.net]

Sent: Monday, April 26, 2004 6:36 PM

To: tom.grim@oak.doe.gov.

Subject: DOE plan for Livermore Lab

1/04.01

We, Ernest and Arline Dust, strongly object to the Department of Energy's plan for Livermore. We cannot risk further nuclear proliferation and the inevitable contamination, perhaps destruction, that may follow.

Ernest and Arline Dust  
462 Pismo Court  
Livermore, CA 94550